

Aron M. Oliner (SBN: 152373)
Geoffrey A. Heaton (SBN: 206990)
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Attorneys for WESTERN ENVIRONMENTAL
CONSULTANTS, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF GEOFFREY A.
HEATON IN SUPPORT OF
WESTERN ENVIRONMENTAL
CONSULTANTS, LLC'S
OPPOSITION TO REORGANIZED
DEBTORS' NINTH OMNIBUS
OBJECTION TO CLAIMS (NO
LIABILITY CLAIMS)**

Date: October 13, 2020

Time: 10:00 a.m.

Place: (Telephonic Appearance Only)

450 Golden Gate Avenue
Courtroom 17, 16th Floor
San Francisco, CA 94102

Related Docket No. 8986

I, Geoffrey A. Heaton, declare:

1. I am an attorney at law duly licensed to practice before this Court, and am special
counsel in the law firm of Duane Morris LLP, counsel to creditor Western Environmental

1 Consultants, LLC ("WEC"). The matters stated below are made and based upon my personal
2 knowledge, except for those matters stated upon information and belief, and as to those matters I
3 believe them to be true. If called as a witness, I could and would competently testify to the matters
4 set forth below.

5 2. Attached hereto as **Exhibit A** is a true and correct copy of an email I received on
6 February 26, 2020 from a representative of Prime Clerk regarding the Fire Victim Plan Solicitation
7 Directive that my office received in the captioned cases.

8 3. Attached hereto as **Exhibit B** is a true and correct copy of the executed Fire Victim
9 Plan Solicitation Directive that my office submitted to Prime Clerk in these cases, together with my
10 cover email to Prime Clerk and the response to that email by a Prime Clerk representative.

11 4. Attached hereto as **Exhibit C** is a true and correct copy of an email I received on May
12 22, 2020 from Jay Minga of the Weil, Gotshal firm.

13 5. Attached hereto as **Exhibit D** is a true and correct copy of the Notice of the
14 Reorganized Debtors' Ninth Omnibus Objection to Claims (No Liability Claims) that my office
15 received.

16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct. Executed on September 25, 2020, at San Francisco, California.

18
19 /s/ Geoffrey A. Heaton (206990)
20 GEOFFREY A. HEATON
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EXHIBIT A

From: Stanislav Kesler <skesler@primeclerk.com>

Sent: Wednesday, February 26, 2020 8:30 AM

To: Heaton, Geoffrey A. <GHeaton@duanemorris.com>

Cc: Micros, Deanna <DMicros@duanemorris.com>; Oliner, Ron <ROliner@duanemorris.com>; DiMassa, Rudolph J. <DiMassa@duanemorris.com>; PGE Ballots <PGEBallots@primeclerk.com>

Subject: RE: PG&E - Fire Victim Plan Solicitation Directive - Duane Morris LLP

Geoffrey:

Debtor's counsel has confirmed that vendors who may have claims arising from indemnification or contribution rights should be treated as fire victim claims for the time being. Accordingly, you should fill out the solicitation directive.

Let us know if you have any additional questions.

Best,
Stan

Stanislav Kesler

skesler@primeclerk.com

Prime Clerk

One Grand Central Place
60 East 42nd Street
Suite 1440
New York, NY 10165
212 257 5468 office
646 623 6530 mobile
primeclerk.com

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EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:**PG&E CORPORATION,****- and -****PACIFIC GAS AND ELECTRIC
COMPANY,****Debtors.**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Chapter 11 Case

No. 19-30088 (DM)

(Lead Case)

(Jointly Administered)

**FIRE VICTIM PLAN
SOLICITATION DIRECTIVE***

I hereby direct that distribution of Solicitation Packages in connection with the *Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization dated January 31, 2020* [Docket No. 5590] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the "**Plan**") be implemented as set forth below.

Enclosed herewith is an Excel spreadsheet that lists the names, addresses, and (if known) e-mail addresses of my Fire Victim Clients (the "**Client List**") as compiled by the Solicitation Agent based on a review of the Fire Victim Claims that have been filed and scheduled in the Chapter 11 Cases as has been modified by the undersigned to make any necessary additions, subtractions, or other corrections. To the extent I have added any additional Fire Victim Clients that were not originally listed by the Solicitation Agent on the Client List, I have enclosed the Proof of Claim or Schedule number that corresponds to each such additional Fire Victim Client's Fire Victim Claim.

Box 1 ☐ No Solicitation Required. I do not represent any clients asserting Fire Victim Claims against the Debtors. By signing below, I hereby certify and authorize the Solicitation Agent to remove me from any further service or distribution lists relating to Fire Victim Claims in the above-captioned Chapter 11 Cases.

Box 2 ☒ Master Ballot Solicitation Method. I certify that (a) I will collect and record the votes of each of my Fire Victim Clients through customary and accepted practices (e.g., by e-mail, telephone, or other standard communications), or that I have obtained authority to procedurally cast votes for each of my Fire Victim Clients or (b) I have the authority under applicable law to vote to accept or reject the Plan on behalf of each of my Fire Victim Clients (and I will provide the Solicitation Agent with a valid power of attorney to that effect). Accordingly, in lieu of soliciting votes from each of my Fire Victim Clients, I will record the votes to accept or reject the Plan for each of my Fire Victim Clients on a master ballot (a "**Fire Victim Master Ballot**") that I will submit to the Solicitation Agent. I understand that by electing this procedure I must meet all applicable standards to receive informed consent from my Fire Victim Clients. I understand that if I elect this procedure I shall either (i) provide the Disclosure Statement, either in hard copy or electronic format, to my Fire Victim Clients, or (ii) request that, for informational purposes, the Solicitation Agent serve Solicitation Packages (without a Ballot) on my Fire Victim Clients.

* This Fire Victim Plan Solicitation Directive amends and replaces the one previously submitted dated February 13, 2020.

By signing below, I hereby certify that: (i) I have authority under applicable law or I will collect or otherwise receive duly valid and enforceable authorizations or instructions to vote to accept or reject the Plan on behalf of my Fire Victim Clients in accordance with my Firm's customary practices; (ii) no Solicitation Packages need to be provided to any of my Fire Victim Clients unless I have made the informational service election below; and (iii) I represent each of the Fire Victim Clients set forth on the Client List which I am submitting to the Solicitation Agent contemporaneously with this Fire Victim Plan Solicitation Directive.

☐ Informational Service Election. Although I have authority to record the votes of my Fire Victim Clients pursuant to the Master Ballot Solicitation Method set forth above, I request that the Solicitation Agent serve copies of the Solicitation Packages (without a Ballot) on each of my Fire Victim Clients. If you have made this election, please indicate:

- i. the approximate number of Fire Victim Clients that you represent: _____; and
- ii. whether you intend to have the Solicitation Agent include a cover letter or other communication from you to your Fire Victim Clients with the Solicitation Packages, which must be submitted together with the Fire Victim Solicitation Directive on or before the Fire Victim Solicitation Directive Deadline: [YES] or [NO].

Box 3 ☐ Direct Solicitation Method. I do not have authority to vote to accept or reject the Plan on behalf of any of my Fire Victim Clients or I have such authority but do not intend to exercise it. Accordingly, I hereby direct the Solicitation Agent to send Solicitation Packages (including Ballots) directly to each of my Fire Victim Clients at the addresses identified in the Client List. I understand and will advise my Fire Victim Clients that completed Ballots must be submitted to the Solicitation Agent individually by my Fire Victim Clients under this procedure.

By signing below, I hereby certify that I represent each of the Fire Victim Clients set forth on the Client List which I am submitting to the Solicitation Agent contemporaneously with this Fire Victim Plan Solicitation Directive. If you have selected this solicitation method, please indicate:

- i. the approximate number of Fire Victim Clients that you represent: _____; and
- ii. whether you intend to have the Solicitation Agent include a cover letter or other communication from you to your Fire Victim Clients with the Solicitation Packages, which must be submitted together with the Fire Victim Solicitation Directive on or before the Fire Victim Solicitation Directive Deadline: [YES] or [NO].

Box 4 ☐ Indirect Solicitation Method. I do not have authority to vote to accept or reject the Plan on behalf of any of my Fire Victims Clients, or I have such authority but do not intend to exercise it. Accordingly, as an alternative to the procedure described in Box 3 above, I hereby instruct the Solicitation Agent to send individual Solicitation Packages for each of my Fire Victim Clients to me, and I will forward such packages to my Fire Victim Clients for return directly to the Solicitation Agent. I understand and will advise my Fire Victim Clients that completed Ballots must be submitted to the Solicitation Agent individually by my Fire Victim Clients under this procedure.

By signing below, I hereby certify that: (i) I represent each of the Fire Victim Clients set forth on the Client List which I am submitting to the Solicitation Agent contemporaneously with this Fire Victim Plan Solicitation Directive; (ii) Solicitation Packages for each of my Clients should be delivered to my office, and I will deliver such packages to my Fire Victim Clients within three (3) business days after receipt; and (iii) within three (3) business days of my delivery of the

Solicitation Packages to my Fire Victim Clients, I will file an affidavit with the Bankruptcy Court evidencing such service and will send a copy of such affidavit to the Solicitation Agent. The affidavit of service does not need to list each Fire Victim Client individually; rather, the affidavit need only state that (a) service of the Solicitation Packages was completed; (b) the date(s) on which such service took place; and (b) that you have provided the Client List to the Solicitation Agent. If you have selected this solicitation method, please indicate:

- i. the approximate number of Fire Victim Clients that you represent: _____;
- iii. whether you intend to have the Solicitation Agent include a cover letter or other communication from you to your Fire Victim Clients with the Solicitation Packages, which must be submitted together with the Fire Victim Solicitation Directive on or before the Fire Victim Solicitation Directive Deadline: [YES] or [NO]; and
- ii. a delivery address for the Solicitation Packages, if such address is different from the address below: _____.

Box 5 ☐ Hybrid Solicitation Method. I have authority to record the votes of certain of my Fire Victim Clients pursuant to the Master Ballot Solicitation Method set forth in Box 2 above (collectively, the “**Master Ballot Fire Victim Clients**”). Accordingly, in lieu of soliciting votes from my Master Ballot Fire Victim Clients individually, I will record the votes to accept or reject the Plan of my Master Ballot Fire Victim Clients on a Fire Victim Master Ballot that I will submit to the Solicitation Agent. By signing below, I hereby certify that: (i) I have authority under applicable law or I will collect or otherwise receive duly valid and enforceable authorizations or instructions to vote to accept or reject the Plan on behalf of my Master Ballot Fire Victim Clients; (ii) no Solicitation Packages need to be provided to any of my Master Ballot Fire Victim Clients unless I have made the informational service election below; and (iii) I represent each of the Master Ballot Fire Victim Clients set forth on the Client List which I am submitting to the Solicitation Agent contemporaneously with this Fire Victim Plan Solicitation Directive. I understand that if I elect this procedure I must indicate on my Client List those Fire Victim Clients that are Master Ballot Fire Victim Clients and those that are Individual Ballot Fire Victim Clients (as defined below).

☐ **Informational Service Election.** Although I have the authority to record the votes of my Master Ballot Fire Victim Clients pursuant to the Master Ballot Solicitation Method set forth above, I request that the Solicitation Agent serve copies of the Solicitation Packages (without a Ballot) on certain of my Master Ballot Fire Victim Clients. If you have made this election, please indicate:

- i. the approximate number of Master Ballot Fire Victim Clients that you represent: _____; and
- ii. whether you intend to have the Solicitation Agent include a cover letter or other communication from you to your Master Ballot Fire Victim Clients with the Solicitation Packages, which must be submitted together with the Fire Victim Solicitation Directive on or before the Fire Victim Solicitation Directive Deadline: [YES] or [NO].

With respect to my remaining Fire Victim Clients (the “**Individual Ballot Fire Victim Clients**”), I either do not have, or do not intend to exercise, the authority to vote to accept or reject the Plan on behalf of such clients. Accordingly, I hereby direct the Solicitation Agent to solicit votes on the Plan from my Individual Ballot Fire Victim Clients as follows:

Box 5A ☐ I hereby direct the Solicitation Agent to send Solicitation Packages directly to each of my Individual Ballot Fire Victim Client at the addresses identified in the Client List. By signing below, I hereby certify that I represent each of the Individual Ballot Fire Victim Clients set forth on the Client List which I am submitting to the Solicitation Agent contemporaneously with this Fire Victim Plan Solicitation Directive. I understand and will advise my Fire Victim

Clients that completed Ballots must be submitted to the Solicitation Agent individually by my Individual Ballot Fire Victim Clients under this procedure. If you have made this election, please indicate:

- i. the approximate number of Individual Ballot Fire Victim Clients that you represent: _____; and
- ii. whether you intend to have the Solicitation Agent include a cover letter or other communication from you to your Individual Fire Victim Clients with the Solicitation Packages, which must be submitted together with the Fire Victim Solicitation Directive on or before the Fire Victim Solicitation Directive Deadline: [YES] or [NO].

Box 5B ☐ I hereby direct the Solicitation Agent to send the Solicitation Packages for each of my Individual Ballot Fire Victim Clients to me, and I will forward such packages to my Individual Ballot Fire Victim Clients. By signing below, I hereby certify that (i) I represent each of the Individual Ballot Fire Victim Clients set forth on the Client List which I am submitting to the Solicitation Agent contemporaneously with this Fire Victim Plan Solicitation Directive; (ii) Solicitation Packages for each of my Individual Ballot Fire Victim Clients should be delivered to my office, and I will deliver such packages to the Individual Ballot Fire Victim Clients within three (3) business days after receipt; and (iii) within three (3) business days of my delivery of the Solicitation Packages to my Individual Ballot Fire Victim Clients, I will file an affidavit with the Bankruptcy Court evidencing such service and will send a copy of such affidavit to the Solicitation Agent. The affidavit of service does not need to list each Individual Ballot Fire Victim Client individually; rather, the affidavit need only state that (a) service of the Solicitation Packages was completed; (b) the date(s) on which such service took place; and (c) you have provided, the Client List to the Solicitation Agent. I understand and will advise my Fire Victim Clients that completed Ballots must be submitted to the Solicitation Agent individually by my Individual Ballot Fire Victim Clients under this procedure. If you have selected this solicitation method, please indicate:

- i. the approximate number of Individual Ballot Fire Victim Clients that you represent: _____;
- ii. whether you intend to have the Solicitation Agent include a cover letter or other communication from you to your Individual Ballot Fire Victim Clients with the Solicitation Packages, which must be submitted together with the Fire Victim Solicitation Directive on or before the Fire Victim Solicitation Directive Deadline: [YES] or [NO]; and
- iii. a delivery address for the Solicitation Packages, if such address is different from the address below: _____.

SIGNATURE:

Name of Attorney: Aron M. Oliner (SBN 152373) / Geoffrey A. Heaton (SBN 206990)

Name of Law Firm: Duane Morris LLP

Street Address: One Market Plaza, Spear Street Tower, Suite 2200

City, State and Zip Code: San Francisco, CA 94105-1127

Telephone Number: (415) 957-3000

E-Mail Address: roliner@duanemorris.com / gheaton@duanemorris.com

Signature: 

Date Completed: March 3, 2020

Instructions for Returning This Directive

The Debtors are requesting that this Fire Victim Plan Solicitation Directive be returned so that it is received by the Debtors' Solicitation Agent on or before **4:00 p.m. (Prevailing Pacific Time) on March 3, 2020**¹ (i) by mail at Prime Clerk LLC, PG&E Ballot Processing, c/o Prime Clerk, One Grand Central Place, 60 East 42nd Street, Suite 1440, New York, New York 10165 or (ii) via e-mail at PGEballots@PrimeClerk.com.

In accordance with the Solicitation Procedures, if you fail to return the Fire Victim Plan Solicitation Directive by the Fire Victim Solicitation Directive Deadline, the Solicitation Agent will solicit votes on the Plan from your Fire Victim Clients according to the Direct Solicitation Method described above.

Requirements for the Client List

As indicated above, you must confirm the accuracy of the names, addresses, and (if known) e-mail addresses of your Fire Victim Clients set forth on the enclosed Client List. In accordance with the Solicitation Procedures, you must make any necessary additions, subtractions, or other corrections to the spreadsheet(s) provided, and return the Client List in the same electronic format provided to you by the Solicitation Agent no later than the Fire Victim Solicitation Directive Deadline. If you add any additional Fire Victim Clients that were not originally listed by the Solicitation Agent, you must provide the Solicitation Agent with the Proof of Claim or Schedule number that corresponds to each such additional Fire Victim Client's Fire Victim Claim. The Solicitation Agent will endeavor to identify on the Client Lists any conflicting records indicating that an individual Fire Victim Client may be represented by more than one Firm.

If you have checked Box 5, you must also check either Box 5A or Box 5B to direct the Solicitation Agent as to the solicitation method for your Individual Ballot Fire Victim Clients, and you will be required to submit two Client Lists: one listing your Master Ballot Fire Victim Clients and one listing your Individual Ballot Fire Victim Clients.

Client Lists must be returned so as to be received no later than **March 3, 2020** either (i) by mail, with the Client List included on a USB drive, to Prime Clerk LLC, PG&E Ballot Processing, c/o Prime Clerk, One Grand Central Place, 60 East 42nd Street, Suite 1440, New York, New York 10165; or (ii) e-mail to PGEballots@PrimeClerk.com. If you have any technical questions, or need to arrange for special delivery of your Client List, please contact Prime Clerk at PGEballots@PrimeClerk.com.

¹ The Fire Victim Solicitation Directive Deadline may be extended based upon the date the Solicitation Procedures Motion is approved.

Micros, Deanna

From: Heaton, Geoffrey A.
Sent: Tuesday, March 3, 2020 11:48 AM
To: PGE Ballots
Cc: Stanislav Kesler; DiMassa, Rudolph J.; Oliner, Ron; Micros, Deanna
Subject: Fire Victim Plan Solicitation Directive
Attachments: PG&E - PG&E Co. - Response to Fire Victim Plan Solicitation Directive - signed 03-03-2020.pdf; PG&E Corp. _ PG&E Co.- Client List - Duane Morris LLP (Revised Spreadsheet for Submission to PrimeClerk with Directive, 02_25_2020).XLSX

Dear Sir or Madam:

Duane Morris LLP is counsel to ArborMetrics Solutions, LLC, Asplundh Construction, LLC, Trees, LLC, Utility Tree Service, LLC and Western Environmental Consultants, LLC (collectively, "Claimants") in the PG&E cases. On behalf of Claimants, we submit the attached Fire Victim Plan Solicitation Directive ("Directive"). Please note that the Directive amends the previous submission made to Prime Clerk on or about February 13, 2020. Also attached is a client list in Excel format.

Please note that Claimants amended their claims last week, and claim numbers have not yet been assigned to the amended claims. Accordingly, the client list spreadsheet references Claimants' original claim numbers, and indicates that the amended claim numbers are "TBD."

Thank you for your attention to this matter. Please let me know if you have any questions.

Geoff Heaton



Micros, Deanna

From: Mary J. Carpenter <mcarpenter@primeclerk.com>
Sent: Tuesday, March 3, 2020 12:14 PM
To: Heaton, Geoffrey A.; PGE Ballots
Cc: Stanislav Kesler; DiMassa, Rudolph J.; Oliner, Ron; Micros, Deanna
Subject: RE: Fire Victim Plan Solicitation Directive

Geoffrey,

Thank you for the information below. Confirming receipt of the amended Directive for Form No: **056 - Duane Morris LLP**. We will update our records accordingly.

Best,
Mary

Mary Carpenter
mcarpenter@primeclerk.com

Prime Clerk
One Grand Central Place
60 East 42nd Street
Suite 1440
New York, NY 10165
347 859 8084 office
primeclerk.com

EXHIBIT C

From: Minga, Jay <Jay.Minga@weil.com>

Sent: Friday, May 22, 2020 10:52 AM

To: Heaton, Geoffrey A. <GHeaton@duanemorris.com>

Cc: Goren, Matthew <matthew.goren@weil.com>

Subject: In re PG&E - ArborMetrics Solutions, LLC, et al. [Docket Nos. 7233, 7236, 7239, 7241, 7242]

Counsel,

We write in response to the cure objections filed on behalf of your clients listed below. Upon further review, the Debtors have determined that they agree that PG&E's contracts with your clients that were previously identified on the Schedule of Assumed Contracts have all previously expired or terminated and are, therefore, not executory. The Debtors, accordingly, will be amending the schedule of assumed contracts to remove your clients' contracts later today. With respect to the remaining indemnification issues raised by each of your clients in their respective objections, the Debtors will be responding to those objections in their confirmation brief.

- ArborMetrics Solutions, LLC [Docket No. 7233]
- Asplundh Construction, LLC [Docket No. 7236]
- Trees LLC [Docket No. 7239]
- Utility Tree Services [Docket No. 7241]
- Western Environmental Consultants, LLC [Docket No. 7242]

Sincerely,
Jay

Jay Minga

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
Jay.Minga@weil.com
+1 212 310 8378 Direct
+1 646 467 2079 Mobile
+1 212 310 8007 Fax

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EXHIBIT D

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbkllp.com)
Jane Kim (#298192)
(jkim@kbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND EXPUNGE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF THE REORGANIZED
DEBTORS' NINTH OMNIBUS OBJECTION
TO CLAIMS (NO LIABILITY CLAIMS)**

**Response Deadline:
September 29, 2020, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: October 13, 2020

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

Creditor Name: Western Environmental Consultants, LLC

Objected-To Claim(s)							Basis for Objection
Debtor	Date Filed / Scheduled	Secured	Admin	Priority	General Unsecured	Total Amount	
Pacific Gas and Electric Company	2/27/2020	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Protective Claims

On September 3, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the **"Debtors,"** or as reorganized pursuant to the Plan, the **"Reorganized Debtors"**) in the above-captioned chapter 11 cases (the **"Chapter 11 Cases"**), filed their *Ninth Omnibus Objection to Claims (No Liability Claims)* (the **"Omnibus Objection"**) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the **"Bankruptcy Court"**). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors' Counsel by September 29, 2020 (the "Response Deadline");

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.

If you file and serve a timely Response, the date, location and time of the Hearing are:

October 13, 2020 at 10:00 a.m. (Pacific Time)

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court's *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020, **the Hearing will be conducted telephonically or by video conference. The courtroom will be closed.** All parties who wish to appear at the Hearing should refer to the Bankruptcy Court's website, www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone, for current information about how to appear. Reorganized Debtors' Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

1 **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim**
 2 **with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

3 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
 4 Objection, the Reorganized Debtors seek to disallow one or more of your Proof(s) of Claim (as defined
 5 therein) listed above as “Objected-To Claim(s)” on the grounds that the designated Proof(s) of Claim
 6 seek recovery of amounts for which the Debtors are not liable. If you do **NOT** oppose the
 7 disallowance of your Objected-To Proof(s) of Claim listed above, then you do NOT need to file a
 8 written Response to this Omnibus Objection and you do NOT need to appear at the Hearing. If you do
 9 nothing, the Objected-To Claim(s) will be disallowed. To the extent your Proof(s) of Claim relates to
 10 protective, unliquidated claims relating to the Reorganized Debtors’ potential post-petition non-
 11 performance under an assumed agreement, you retain all remedies that would have existed had these
 12 Chapter 11 Cases not been filed, and the Reorganized Debtors represent that they will not raise any
 13 bankruptcy defenses.

14 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance of your
 15 Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in
 16 writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at
 17 PGEclaims@kbklp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on September**
 18 **29, 2020 (the “Response Deadline”):** You must file the Response through the Court’s electronic case
 19 filing (“ECF”) system if you have access to the ECF system; service on the Reorganized Debtors’
 20 Counsel will occur automatically upon ECF filing; and no separate service of your Response is
 21 required. If you do NOT have access to the ECF system, service must be made by electronic mail to
 22 the email addresses of the Reorganized Debtors’ counsel as shown on the Objection, and you must
 23 arrange for the Response to be filed with the Court within two business days thereafter. If you do not
 24 have the ability to serve a Response electronically, the Response must be served by mail, express or
 25 some other means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the
 26 Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or
 27 commercial express service that will make actual delivery not more than two business days after the
 28 Response Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by
 29 email, telephone or facsimile before the Response Deadline of the Claimant’s name and phone number,
 30 the number of the Omnibus Objection, and the fact that a paper Response is being delivered by
 31 express.

32 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:
 33 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the
 34 case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
 35 assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
 36 Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
 37 the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
 38 knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,
 39 and/or the name, address, and telephone number of your attorney and/or designated representative to
 40 whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vii) the
 41 name, address, telephone number, and email address of the party with authority to reconcile, settle, or
 42 otherwise resolve the Omnibus Objection on your behalf, if any.

43 If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above,
 44 then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a
 45 later date. You will receive a separate notice of any such objection.

TO GET COPIES OF THE COMPLETE OBJECTION: Copies of the complete Omnibus Objection and the other pleadings and documents identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov> [PACER account required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free, by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to request a complete copy of the Omnibus Objection, including all Exhibits.

Dated: September 3, 2020

KELLER BENVENUTTI KIM LLP

/s/ Peter J. Benvenutti

Peter J. Benvenutti

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